

Defendant acknowledges receipt of a plea agreement in this case and agrees to

Defendant agrees to plead guilty to the charge pursuant to the plea agreement on or

The material witnesses, Juan Gonzalez-Mendez, Jorge Lopez-Ramirez and Rolando

Are aliens with no lawful right to enter or remain in the United States:

Entered or attempted to enter the United States illegally on or about

Were found in a vehicle driven by defendant in or near Boulevard, California

Were paying \$1,800 to others to be brought into the United States illegally

May be released and remanded immediately to the Department of Homeland

The stipulated facts set forth in paragraph 4 above shall be admitted as

The United States may elicit hearsay testimony from arresting agents

After the material witnesses are ordered released by the Court pursuant to this

provide the signed, original plea agreement to the Government not later than five business days

and that defendant knew or acted in reckless disregard of the fact that they were aliens with no

stipulation and joint motion, if defendant does not plead guilty to the charge set forth above, for any

reason, or thereafter withdraws his guilty plea to that charge, defendant agrees that in any

proceeding, including, but not limited to, motion hearings, trial, sentencing, appeal or collateral

regarding any statements made by the material witness(es) provided in discovery, and such

2

2.

3.

4.

April 27, 2008;

5.

attack, that:

before May 29, 2008.

Rojas-Ramirez, in this case:

a.

b.

c.

d.

e.

a.

b.

substantive evidence:

Security for return to their country of origin.

lawful right to enter or remain in the United States;

and/or transported illegally to their destination therein; and,

before the disposition date set by the Court.

- 12
- 14
- 15
- 16
- 19
- 21
- 22
- 24
- 25 26

27

28

Stipulation of Fact and Joint Motion for Release of Material Witness(es) And Order Thereon in United States v. Nibardo Sandoval-Barron

20

1

2

3

4

5

6

21

22

24

25

26

To Sandoval Bo

Defendant

27 28

Stipulation of Fact and Joint Motion for Release of Material Witness(es) And Order Thereon in United States v. Nibardo Sandoval-Barron

08MJ1318

United States v. Nibardo Sandoval-Barron

Case 3:08-mj-01318-NLS Document 7 Filed 05/13/2008

Page 4 of 4